



Scott Michael Mishkin, PC ATTORNEYS AND COUNSELORS AT LAW

Scott Michael Mishkin, Esq.

June 27, 2025

Via ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Morales, et al. v. The Riverdale Management Group LTD., et al.
Case No.: 24-cv-4474 (KPF)

Dear Judge Failla:

As counsel for the defendants, we write with the consent of plaintiff's counsel to respectfully request an extension of the parties' deadline to file the proposed settlement agreement and supporting motion in the above matter. The current deadline to submit the motion for settlement approval is June 27, 2025.

As an update to the Court, the parties were close to finalizing all of the settlement documents, however, a last-minute modification was requested by defendants delaying the execution of the agreement. Specifically, while the overall settlement amount will remain the same, unforeseen circumstances necessitated a modification of the payment terms which resulted in the need for a revised agreement and confession of judgment. The parties have agreed on new payment terms and plaintiffs' counsel has advised that the revised agreement and confession of judgment will be completed by next week. Accordingly, the parties respectfully request an additional three weeks to finalize and execute the settlement papers.

The parties apologize for the last-minute nature of this request but the agreement to modify the original payment structure only just recently occurred.

Your Honor's consideration is appreciated.

Respectfully submitted,

/s/ Scott Michael Mishkin

cc: All counsel of record (via ECF)

MEMO ENDORSED

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Application GRANTED. In light of the above, the parties' deadline to file their completed settlement agreement along with a joint letter regarding the fairness of the settlement agreement is hereby ADJOURNED *nunc pro tunc* to **July 18, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 50.

Dated: June 30, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE